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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

June 2008 Grand Jury

Criminal Case No. 0572 JAM

Title 8, U.S.C.,

Secs. 1324(a)(1)(A)(ii) and (v)(I) - Conspiracy to Transport Illegal Aliens; Title 8, U.S.C., Sec. 1324 (a)(1)(A)(ii) and (v)(II) - Transportation of

Illegal Aliens and Aiding and Abetting

The grand jury charges:

Plaintiff,

Defendants.

UNITED STATES OF AMERICA,

RASHAD TARIQ LANSING (1),

JOSE HERNANDEZ (2),

GUADALUPE LANSING (3),

v.

Count 1

Beginning at a date unknown to the grand jury and continuing up to and including February 2, 2009, within the Southern District of California, and elsewhere, defendants RASHAD TARIQ LANSING, JOSE HERNANDEZ and GUADALUPE LANSING, with the intent to violate the immigration laws of the United States, did knowingly and intentionally conspire together and with each other and with other persons unknown to the grand jury, to transport and move illegal aliens within the United States; in violation of Title 8, United States Code, Sections $1324\,(a)\,(1)\,(A)\,(ii)$ and $(v)\,(I)\,.$

CSA:nlv:San Diego 2/17/09



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Count 2

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On or about February 2, 2009, within the Southern District of California, defendants RASHAD TARIQ LANSING, JOSE HERNANDEZ and GUADALUPE LANSING, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Sergio Chamorro-Sanchez, had come to, entered and remained in the United States in violation of law, did transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 3

On or about February 2, 2009, within the Southern District of California, defendants RASHAD TARIQ LANSING, JOSE HERNANDEZ and GUADALUPE LANSING, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Ramon Rivera-Avila, had come to, entered and remained in the United States in violation of law, did transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

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Count 4

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On or about February 2, 2009, within the Southern District of California, defendants RASHAD TARIQ LANSING, JOSE HERNANDEZ and GUADALUPE LANSING, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Gabriel Estrada-Torres, had come to, entered and remained in the United States in violation of law, did transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

DATED: February 18, 2009.

A TRUE BILL:

person

KAREN P. HEWITT United States Attorney

SETH ASKINS

Assistant U.S. Attorney